

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

TERESSA ONOFORE FRANCO (04)

NO. 3:19-CR-371-L

AMENDED FACTUAL RESUME

In support of Franco's plea of guilty to the offense in Count Four of the Indictment, Franco, the defendant, Hugo Aguilar, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count Four of the Indictment, charging a violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C), that is, Possession with Intent to Distribute a Controlled Substance, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant knowingly possessed a controlled substance;
- Second.* That the substance was in fact a mixture or substance containing a detectable amount of methamphetamine; and
- Third.* That the defendant possessed the substance with the intent to distribute it.

¹ Pattern Crim. Jury Instr. 5th Cir. 2.93 (2015).

STIPULATED FACTS

1. Between in or about June 2018 and in or about October 2019, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, Teresa Onofre Franco, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

2. More specifically, on June 15, 2019, in Dallas, Texas, Franco was in possession of approximately 47 kilograms of methamphetamine, which she intended to distribute to another person.

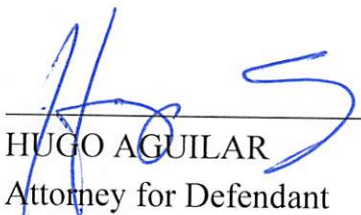
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3. The defendant agrees that the defendant committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count Four of the Indictment.

AGREED TO AND STIPULATED on this 25th day of May, 2021.

PRERAK SHAH
ACTING UNITED STATES ATTORNEY


TERESSA ONOFORE FRANCO
Defendant


HUGO AGUILAR
Attorney for Defendant


P.J. MEITL
Assistant United States Attorney
District of Columbia Bar No. 502391
Virginia State Bar No. 73215
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Tel: 214-659-8680
Fax: 214-659-8812
Email: philip.meitl@usdoj.gov